



# Minneapolis in Any Language

Policies and Procedures to Ensure Equal Access to City Services for  
People with Limited English Proficiency

**September 2012**

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# 1. Summary

## What does this plan address?

This plan describes how the city of Minneapolis will improve access to city services for people who speak limited English.

One in five Minneapolis residents speaks a language other than English in their homes. This means that increasingly, city of Minneapolis employees are providing services to people who may not speak fluent English. This plan offers a systematic approach for adapting city services to meet the needs of these individuals.

## What are the city's primary language groups?

The primary language groups identified in Minneapolis are below (in size order). These are the 6 languages that the city will be focusing on in the LEP plan. Section 3 provides information on how these primary languages were identified.

- Spanish
- Somali
- Hmong
- Laotian
- Oromo
- Vietnamese

## How was the plan created?

In November 2003, the City Council passed a resolution approving the creation of a citywide Limited English Proficiency Plan, to give specific direction to staff about how to make city services accessible to those who speak limited English. An eight-month planning process beginning January 2004 involved representatives of all city charter departments. Members of the LEP Plan Work Team reviewed relevant legal mandates, consulted LEP plans created by other cities and counties, and met with several groups representing the interests of limited English speakers, before drafting this plan and accompanying worksheets for departments.

In 2010, the Neighborhood and Community Relations Department which is in charge of overseeing the LEP plan reviewed the document and made relevant updates to reflect the most accurate picture of the City's LEP populations.

## What does LEP mean?

LEP stands for Limited English Proficiency. A person who has limited proficiency in English cannot speak, read, write or understand the English language at a level that permits him or her to interact effectively with English speakers.

## **Why does the city need a plan for making services accessible to LEP individuals?**

The City of Minneapolis is strongly committed to making city services and information about those services available to everyone, regardless of language barriers. This commitment stems from overall city goals of responsive government, community engagement, and customer service. As residents, workers or visitors who contribute to city life, people with limited English proficiency are entitled to fair and equal access to service.

The city of Minneapolis and its departments are required by federal law to plan for and provide meaningful access to services for those with limited English proficiency, Title VI of the Civil Rights Act of 1964 and related federal regulations, state law and municipal ordinances apply to all city departments and contracted vendors.

## **What is “meaningful access”?**

Meaningful access means that a person:

- Is given adequate information;
- Can understand the services and benefits available;
- Can receive the services for which he or she is eligible; and
- Can communicate the relevant circumstance of his or her situation.

## **What does the plan cover?**

The plan describes city policies and procedures for:

- Providing notice to limited English speakers of their right to service;
- Identifying LEP individuals and needed LEP services in city departments;
- Providing free spoken language interpreting;
- Offering free written translations of vital city documents on request;
- Hiring of people with bi-lingual and/or cultural competency abilities to meet multilingual service needs and;
- Offering training on LEP service mandates to all city staff.

## **How does this plan apply to city departments?**

This document provides policies and procedures that will apply to all City departments. All charter departments of the city will be required to produce their own, department-specific plans and to budget for LEP services, which started in

2005.

## **Who is responsible for the plan?**

The Neighborhood and Community Relations Department and the City Coordinator's Office oversee the development of the citywide LEP plan. Ahmed Muhumud, the city's Access and Outreach Manager, will assist all city departments in updating and implementing plans at the department level.

## **Acknowledgements**

This plan was produced by members of an interdepartmental team with Patricia Ohmans, MPH and Garth Osborn, MPH of Health Advocates, Community Health Consultants, [www.healthadvocates.info](http://www.healthadvocates.info).

For more information about the plan or about LEP services in Minneapolis, contact Access and Outreach Manager Ahmed Muhumud by phone at 612-673-2162 or email him at: [ahmed.muhumud@ci.minneapolis.mn.us](mailto:ahmed.muhumud@ci.minneapolis.mn.us).

## **2. Introduction**

This chapter includes:

- How to use this plan
- The LEP population in Minneapolis
- Legal mandates for LEP services

## How to Use This Plan

This plan is intended for department managers and supervisors and for staff who interact directly or indirectly with LEP individuals in Minneapolis. LEP legal requirements may also apply to subcontractors and vendors who do business with the city. LEP community members and advocates can refer to this plan to learn about the city's commitment to equal access.

The plan does several things:

- Explains the legal mandate behind LEP planning
- Defines key concepts in LEP service
- Lays out general guidelines that are minimum expectations for all city services and departments
- Sets a timetable and assigns responsibility for implementation; and describes how the plan will be monitored and updated
- Lists key definitions

## The LEP Population in Minneapolis

Minnesota and its largest city, Minneapolis, have become increasingly diverse over the past several decades. Immigrants have contributed greatly to the city's economic, cultural, and linguistic diversity. In 2002 alone, 13,522 legal immigrants arrived in the state from 160 countries. This constituted the largest number of new arrivals since 1992 and an increase of 2,000 from the previous year. For most of these new arrivals, English is not their primary language.

One key way to track the proliferation of languages spoken in the state is to ask school children what language they speak at home.

The following tables are the primary languages spoken at home by Minneapolis public school students as well as the amounts of students enrolled in the school system according to their race.

### 2011-2012 Minneapolis Public School, Fall Enrollment of Primary Home Language

Language Spoken at Home	Total
English	23,159
Hmong	1,497
Laotian	115
Somali	2,103
Spanish	5,541
Vietnamese	93
Oromo	Data not available
Other	434
Total	32,942

Source: *Minnesota Department of Education*



### 2011 Minneapolis Public School, Breakdown by Race

<b>Race</b>	<b>Total</b>
American Indian	1,649
Asian	2,778
Black	12,651
Hispanic	6,256
White	10,992
Total	34,326

Source: *Minnesota Department of Education*

## Legal Mandates for LEP Services

There is a compelling legal argument for LEP services. The city of Minneapolis and its departments are required by federal and state law to plan for and provide meaningful access to services for city residents with limited English.

According to an opinion from the Minneapolis City Attorney's office, "Title VI of the Civil Rights Act of 1964 and the implementing federal regulations require city departments receiving federal financial assistance to provide meaningful access to their programs and activities for LEP persons. Failure to provide meaningful access could result in a loss of federal funding. Private individuals could bring a civil action alleging intentional discrimination in the denial of services based upon their protected class status...Nearly every city department receives some sort of federal financial assistance."

Title VI of the Civil Rights Act of 1964 and related federal regulations, state law and municipal ordinances apply to all city departments and contracted vendors.

### **3. What is LEP Service?**

This chapter includes:

- Components of LEP service
- General policies for LEP service
- General procedures for LEP service

# Components of LEP Service

*There are many ways in which LEP individuals must be served by the city. It is not enough just to have translated materials, or bilingual staff, or multilingual signs.*

This plan addresses how services will be provided in each of the areas below, through general policies and through specific procedures.

- Notice: providing notice to limited English speakers of their right to service;
- Identification: identifying LEP individuals and needed LEP services in city departments;
- Interpreting: offering free, timely spoken language interpretation for LEP individuals;
- Translation: providing free written language translations of vital city documents on request;
- Staffing: hiring to meet multilingual service needs; and
- Training: delivering training on LEP service mandates to all city staff.

## General Policies for LEP Service

(Specific policies for LEP service areas are spelled out in sections 4, 5, and 6)

**Individuals with limited English proficiency are entitled to the same kinds and levels of service from Minneapolis city employees as all other individuals.**

### Updating and monitoring the LEP plan

Minneapolis' LEP plan is updated annually. Updating the plan is the responsibility of the Access and Outreach division of the Neighborhood and Community Relations Department.

### Calculating primary language groups

Minneapolis' primary language groups are identified using an established formula. This formula will be re-applied annually. Primary language groups may change, as new data appears. For implementing the plan, which began in 2004 and the 2009 data which was used to update the plan, the formula shows that the primary language groups in Minneapolis are (in size order):

1. Spanish
2. Hmong
3. Somali
4. Laotian
5. Oromo
6. Vietnamese

## General Procedures for LEP Service

### How to evaluate the LEP plan

Each year, the city of Minneapolis will conduct an evaluation of the LEP plan to determine its effectiveness. The Access and Outreach Manager will lead the evaluation with staff in each department.

**The evaluation will include:**

- Assessment of the number of Minneapolis residents with LEP;
- Assessment of the current level of services delivered to LEP individuals by each city charter department;
- Assessment of training levels of city staff regarding LEP services; and
- Feedback and comments from LEP communities, including LEP community organizations and advocacy groups, on the effectiveness of the city's LEP services.

## **4. Notice and Identification**

This chapter includes:

- Policies for notice
- Procedures for notice
- Policies for identification
- Procedures for identification

# Policies for Notice

**The city must proactively notify LEP individuals of their right to service.**

City departments and staff must ensure that people with limited English proficiency know they have the right to free, timely language services.

**Notice should be provided in a variety of ways, including but not limited to:**

- Posting signs in appropriated areas such as waiting rooms, reception areas and other points of entry
- Including standard translated content in outreach documents such as posters or brochures stating that services are available
- Working with LEP organizations and other stakeholders to inform Minneapolis residents of their right to LEP service
- Using a telephone voice mail menu in the most common languages encountered
- Including notices in local newspapers in languages other than English
- Airing notices on non-English language radio and television stations
- Giving presentations at community meetings, schools and other organizations

**Notice includes (at minimum):**

- Information about available LEP services;
- Instructions on accessing services, including directions to city offices; and
- Assurance of free and timely service

**Notice should be provided based on a calculation of the information or service's relative importance to the LEP individual.**

Decisions on which signs, documents or other means of providing notice should be made based on criteria such as:

- Importance or urgency of service;
- Volume of contact; or
- Traffic flow

## Procedures for Notice

**How to make a sign notifying individuals of their right to service**

Departments should post signs in the primary languages informing LEP individuals of their right to free, timely interpreting and translation services.

**How to determine relative need for signs**

Catalog current signs that are posted in public areas. Decide which signs (directional, instructional, etc.) are most important for accessing services. **Translate the most important signs first.**

**Translate every important sign into the primary languages.** The Access and Outreach Division can be consulted regarding signage wording; call 612-673-2162.

**How to request a permanent sign for an office in City Hall**

Permanent signs posted in City Hall must conform to historical and aesthetic standards. Contact the Minneapolis Building Commission, 612-596-9512, before posting notice signs. **How to request a permanent sign for another City building or office**  
Contact and consult with Barb Johns of Property Services at 612-673-3051.

**How to include a statement in non-English languages about free LEP service in print, audio, or video materials**

Vital documents used for city services should include a version of the following message, translated into the primary languages: “Attention: If you have any questions regarding this material please call 311 (or insert your department telephone number).” For more information on the language block, see the *Language Block* [online](#) at CityTalk.

## **Policies for Identification**

**The city will collect sufficient data about LEP individuals to provide legally mandated services.**

The city should establish, at minimum, how many Minneapolis residents primarily speak a language other than English, and which languages they speak. This number should be recalculated, at minimum, once per year.

**Information collected about LEP individuals must never be used to discriminate against groups or individuals.**

Immigration status is not relevant in determining whether a resident of Minneapolis is eligible for the LEP services outlined in this plan. City employees should not ask an LEP individual about their immigration status, even in casual conversation. All LEP individuals are eligible for city services.

**The city must track services provided to LEP individuals.**

Results of tracking can be used to measure increases in LEP services, to evaluate changes and to make appropriate budgeting decisions.

## **Procedures for Identification**

**How to identify LEP individuals**

LEP individuals can be identified in a variety of ways:

- By analyzing existing data sets, such as census figures or information from public agencies; or
- By asking LEP individuals to indicate their preferred language, using “I Speak” cards or other mechanisms.

**How to use census and other data to estimate LEP population sizes**

General population statistics based on the 2010 US Census are accessible on the US Census Bureau website at [www.census.gov](http://www.census.gov). Statistics on primary languages spoken in Minneapolis schools are available through the Department of Education, at [http://education.state.mn.us/MDE/Data/Data\\_Downloads/Student/Enrollment/District/index.html](http://education.state.mn.us/MDE/Data/Data_Downloads/Student/Enrollment/District/index.html)

**How to measure extent of LEP services**

Ways to collect information about LEP individuals served include:

- Adapting current databases used by the city to track languages spoken by Minneapolis residents;
- Incorporating ‘language spoken’ fields on client intake forms and tracking responses
- Tracking telephone interpreting service usage;
- Counting website ‘hits’ directed to translated content;
- Conducting resident or customer satisfaction surveys;
- Tallying the number of translated materials requested/distributed; and
- Tracking the number of department requests for LEP services.



## **5. Interpreting and Translation**

This chapter includes:

- Policies for interpreting
- Procedures for interpreting
- Policies for translation
- Procedures for translation

# Policies for Interpreting

## **Interpreters must be offered for free, upon request.**

The city of Minneapolis provides interpreter services, free of charge, to people who speak little or no English if needed to access city services.

If an Access and Outreach Specialist cannot be reached, or is unavailable, to provide interpreter services in person or by telephone, the department should use a language service provider that the City has a contract with.

## **Public meetings will have interpreters available, if needed.**

Public meeting notices should include a line advising LEP individuals that interpreters will be provided upon request if there is at least 5 business days notice.

## **The city will use competent, trained and culturally sensitive interpreters.**

Interpretation is more than simply being able to speak two languages. Interpreters are trained professionals who abide by a code of ethics and professional practice standards.

## **City interpreters or city employees who provide interpreting services must demonstrate competence.**

A competent interpreter should demonstrate (at minimum):

- Evidence of training that includes skills and ethics of interpreting;
- Proficiency in English and the other language, as documented in an objective language proficiency test;
- Ability to convey information in both languages, accurately and completely, as demonstrated by a simulated interpreting encounter;
- Fundamental knowledge in both languages of any specialized terms or concepts related to the organization's program or activity; and
- Sensitivity to the LEP person's culture.

## **Competency standards apply to all interpreters used to deliver city services.**

Interpreting services for the city will be performed by trained, professional interpreters, whether city staff, contractors, or telephone interpreters. City staff who works as interpreters must demonstrate competence as defined above. With contract interpreters and telephone interpreters, competency is assumed, but contracting agencies should demonstrate how competency is assessed.

## **Volunteers should not interpret unless shown to be competent, according to city standards.**

Volunteers, friends, or family members whose competence has not been assessed should not be relied upon. The use of untrained volunteers exposes the city to liability, based on its legal obligation to provide competent interpreter services.

## **Children may not interpret.**

For reasons of accuracy, confidentiality and family dynamics, minor children (under 18) may not interpret for family members or other LEP individuals. (This policy does not apply in serious emergency cases, when a minor child is the only available potential interpreter).

## **Volunteers may interpret for LEP voters.**

According to election law, “a voter in need of assistance may obtain the assistance of any individual the voter chooses, except for the voter’s employer, union agent, or a candidate for election...” For a full explanation of assistance to LEP voters, see *MN Statute 204C.15*—assistance to voters.

**Individuals may use their own adult volunteer interpreters under some limited circumstances.**

Staff should never urge or require those who speak little or no English to provide their own interpreter. However, individuals may use their own interpreter if they waive their right to one provided by the city, and if the potential interpreter has demonstrated competence. In situations where the effectiveness of services is compromised or the LEP person’s privacy may be violated, an interpreter should be used.

**Individuals using volunteer interpreters should sign a waiver form.**

Individuals waiving the right to an interpreter provided by the city may be asked to sign a waiver form in their own language. For a sample waiver form, see *Waiver of Interpreter Services* online at CityTalk. Click on “Work Tools” and then on “Language and Translation Services”.

**Interpreting must be timely.**

Access to interpreting services in all city departments must be timely. No one can be denied access to services based on the lack of interpreter availability.

## Procedures for Interpreting

**How to provide interpreting**

Interpreting can be provided in a variety of ways (in descending order of preference):

- By bilingual staff trained in interpreting;
- By Access and Outreach Specialists or other city staff interpreters;
- By telephonic interpretation with language service vendors
- By contract or free-lance professional interpreters;
- By bilingual department staff; and
- By competent volunteer interpreters.

**How to access a city interpreter through the Access and Outreach Division**

1. Identify which language the person speaks. This can be done by asking the person what languages she/he speaks, or (if the individual is onsite and not on the phone) ask him or her to point to their language on a Language Identification Card.
  2. Let the person know that you will arrange for an interpreter.
  3. Call the Access and Outreach Division, within the City’s Neighborhood and Community Relations Department. Access and Outreach Division currently has Spanish, Somali, Oromo, Amharic, Hmong and American Sign Language staff who may be able to provide interpreter services and signing for your department.
- Spanish Line: 612-673-2700
  - Hmong Line: 612-673-2800
  - TTY Line: 612-673-2157
  - Somali, Oromo and Amharic Line: 612-673-3500
  - Access and Outreach Manager: 612-673-2162 or email [Ahmed.Muhumud@ci.minneapolis.mn.us](mailto:Ahmed.Muhumud@ci.minneapolis.mn.us)

The Access and Outreach Division cannot guarantee that an interpreter will be available when you call. If the matter is not urgent, please leave a message and your call will be returned. If the matter is urgent and you need an interpreter immediately or if interpreter services are required for a language other than Spanish, Somali, Oromo, Amharic, Hmong, or American Sign Language, you may use a language service provider that the City has a contract with. *Note: Departments are responsible for covering the cost of services provided by these language service provider vendors.*

### **How to access a telephone interpreter**

Follow the steps above to identify the language needed to request for an interpreter. If staff is not available and you need an interpreter immediately, contact the city's contracted telephone interpreting vendor, Certified Languages International (CLI). CLI provides 24/7 telephone-based interpreter (spoken) services in many languages. The phone number is: 1-888-338-5508. If you would like more information about CLI, check their website at: [www.certifiedlanguages.com](http://www.certifiedlanguages.com).

An access code is required to use this service. Departments will be charged for the service. Please check with your supervisor for your department's access code. If you need assistance or have any questions regarding access codes, please contact Ahmed Muhumud at (612) 673-2162 or email [ahmed.muhumud@ci.minneapolis.mn.us](mailto:ahmed.muhumud@ci.minneapolis.mn.us).

## **Policies for Translation**

### **Translation of vital documents must be offered, for free.**

The city of Minneapolis must provide a translation of vital documents, free of charge, to people who speak little or no English if needed to access city services. City departments may want to work with Access and Outreach for suggestions regarding which documents would be vital or helpful to have translated.

### **Vital documents must be in primary languages.**

"Vital" documents must be available in the city's primary language or readily translated by an interpreter, upon request. Not all documents can be translated and available in every language. City departments must simply have the capacity to translate documents on request, in a timely fashion. (For further discussion and guidance on which documents should be translated, and when, refer to <http://www.lep.gov>).

### **The city will use competent, trained, and culturally sensitive translators.**

Translation is more than simply being able to read and write in two languages. Translators are trained professional who abide by a code of ethics and professional practice standards.

### **Vital documents are translated by competent staff, contract translators or interpreters, including telephone interpreters.**

Materials translated by an outside source must be evaluated for accuracy of translation.

### **City translators must demonstrate competence.**

A competent translator should demonstrate (at minimum):

- Evidence of training that includes skills and ethics of translation;
- Proficiency in English and the other language, as documented in an objective language proficiency test;

- Ability to convey information in both languages, accurately and completely, as demonstrated by a simulated translation job; and
- Fundamental knowledge in both languages of any specialized terms or concepts;
- With approved contract translators, competency is assumed, but a demonstration of competency should be requested.

**Volunteers should not translate materials unless shown to be competent, according to city standards.**

Volunteers, friends, or family members whose competence has not been assessed should not be relied upon. The use of untrained volunteers exposed the city to liability, based on its legal obligation to provide competent translation services.

**Children may not provide translations.**

For reasons of accuracy, confidentiality and family dynamics, minor children (under 18) should not translate vital documents for family members or other LEP individuals. (This policy does not apply in *serious* emergency cases, when a minor child is the only available potential translator).

**Individuals may use their own adult volunteer translators under some limited circumstances.**

Staff should never urge or require those who speak little or no English to provide their own translator. However, individuals may use their own translator if they waive their right to one provided by the city. If the effectiveness of service is comprised or the LEP person's privacy may be violated, a city translator should be used.

**Individuals using volunteer translators should sign a waiver form.**

Individuals waiving the right to translation may be asked to sign a waiver form in their own language. After working through an interpreter and ensuring that the individual waiving services can read in his or her preferred language, use the *Waiver of Interpreter Services* online at CityTalk. Under Quick Links, this is to the left hand side of CityTalk webpage, click "Language and Translation Services".

**Translation must be timely.**

Access to translated materials in all city departments must be timely. No one can be denied access to services based on the lack of translated material or documents.

## **Procedures for Translation**

**How to provide translations**

Translation can be provided in a variety of ways;

- By bilingual staff trained in translating;
- By Access and Outreach Specialists or other city staff translators;
- By contract or free-lance professional translators;
- By bilingual department staff; and
- By competent volunteer translators.

**How to access translation services provided by a telephone interpreter**

If staff is not available and you need an interpreter immediately to provide on-site translation of a document, contact the city's contracted telephone interpreting vendor. For online instructions on

How to *access telephone interpreting services*, go to CityTalk. Under Quick Links, this is to the left hand side of CityTalk webpage, click “Language and Translation Services”.

The city of Minneapolis has contracts with several vendors to provide written translation of documents. Your department will be charged for using these services.

If you have frequent contact with individuals who speak limited or no English, please contact Ahmed Muhumud at 612-673-2162 or email him, [ahmed.muhumud@ci.minneapolis.mn.us](mailto:ahmed.muhumud@ci.minneapolis.mn.us) to discuss how to best handle your translation needs.

## **6. Staffing and Training**

This chapter includes:

- Policies for staffing
- Procedures for staffing
- Training

# Policies for Staffing

**Staffing decisions should be based on the city’s customer service needs, including LEP service needs.**

When individuals are hired for positions in which they interact with LEP residents, language skills may be a relevant job qualification.

Hiring to meet LEP needs can be done in three ways by:

1. Creating new positions for and hiring full-time or part-time interpreters or translators within departments in standard hiring processes;
2. Reclassifying an existing position. If the need for interpretation and translation services is high and is expected to be long-term, departments may request Human Resources study a vacant position to determine if a reclassification is necessary. This request must be made before filling a vacant position;
3. Making bilingual or multilingual capability a “highly desirable” qualification in job announcements.

If bilingual or multilingual skills are included on the job announcement, LEP service capabilities should be assessed as part of the selection process. Assessment may include:

- Informal testing of language proficiency or interpreting/translation ability (*permissible when the skill is a highly desirable qualification*)
- Formal testing of language proficiency or interpreting/translation ability (*recommended, if the skill is a requirement of the job*)
- Certification, transcripts, diplomas or other evidence of language proficiency in English or other language (*shortly encouraged as evidence of skill level for either option*)
- Certification, transcripts, diplomas or other evidence of training in interpreting and/or translation (*strongly encouraged as evidence of skill level for either option*)

**Compensation for an employee who provides interpretation and translation services will depend on whether the service is an essential function of the job.**

If interpreting/translation are an essential job function of the position, the position should be classified appropriately, ensuring the compensation is consistent with legal guidelines.

If interpreting and translating skills are desirable qualifications, but not an essential function of the job, department management may, under many circumstances, require a qualified employee to perform this function within the category of “other duties as assigned”. These duties should not exceed 40% of the employee’s work time.

The pay scale for non-exempt employees is defined by labor contract and departmental policies relating to overtime. Compensating exempt employee falls within the administrative leave language found in [labor agreements](#) and the [Exempt Employment under the Fair Labor Standards \(FLSA\) Policy](#). Both non-exempt and exempt employees may be required to provide these services if there is a business need. Any “additional” benefit (overtime or administrative leave) would be given in accordance with those provisions.

## Procedures for Staffing



### **How to amend a job announcement to include bilingual skills**

When bilingual skills are required for a position, work with your department's [Human Resources Generalist](#) (HRG) to request a job study of a vacant position. Once a determination is made on the job classification, it may be necessary to amend the job announcement. Work with your department's HRG team to make revisions.

When it is determined that these skills are a highly desirable qualification, work with your Department's HRG team to make revisions.

### **How to informally test for language proficiency (*permissible when language skill is a highly desirable qualification*)**

Include a native speaker of the desired language in the interview process, as one of the interviewers. Conduct part of the department interview in the desired language. If the job includes significant writing duties, ask for a writing sample in both languages.

Note: there are important distinctions in the syntax and vocabulary of any language, depending where a speaker is from, their education level, and their social class. Choose the native speaker interviewer with this in mind.

### **How to formally assess language proficiency (recommended if interpreting and translation skills are a required qualification and are part of the position duties.)**

All individuals hired to perform interpreting services should, at minimum, be able to demonstrate oral proficiency in each language (English and other language) through a test, such as the one developed by the American Council of Teachers of Foreign Languages (ACTFL). For more information on the ACTFL proficiency test, visit the Council's website, [www.actfl.org](http://www.actfl.org). Note that there is no ACTFL proficiency test for the Somali language.

It is important to also assess a candidate's English proficiency as well as the other desired language. Currently, English proficiency can be demonstrated through the written exam (always in English and at a level similar to what would be used on the job); the oral exam process (communication skills typically measured); and the department interview process.

### **How to assess an applicant's ability to serve as an interpreter and/or translator**

All individuals hired to deliver interpreting or translation services should, at minimum, demonstrate oral proficiency in each language (as spelled out above) and demonstrate familiarity with and comprehension of ethical standards for interpreters.

All individuals hired to perform interpreting and translation services full time should complete basic courses in interpreter training, such as those offered through the University of Minnesota and community colleges.

## **Training**

**Enterprise training will be coordinated through Human Resources Training and Development and the Access and Outreach Manager and/or Neighborhood and Community Relations Department as part of New Employee Orientation.**

The Access and Outreach Manager will work in partnership with Training and Development to design and provide training and information on the LEP Plan and available city support options.

**Departments are responsible for ensuring all employees understand the LEP Plan and its provisions.**

The Neighborhood and Community Relations Department and Training and Development will partner to create training guidelines, information and tools which will be available to departments. The Neighborhood and Community Relations Department can partner with departments to create and deliver training and information on the LEP Plan.

## **7. Carrying Out the Plan**

The chapter includes:

- Implementation timeline
- Monitoring and updating the plan
- Role of the Department LEP Liaison
- Role of the Access and Outreach Manager
- Resolving complaints about LEP services

# Monitoring and Updating the Plan

Minneapolis' LEP is updated annually. Updating is the responsibility of the Access and Outreach Manager. The evaluation will include:

- Identification of the number of Minneapolis residents with LEP and possible recalculation of the city's primary language groups;
- Assessment of the current level of services delivered to LEP individuals by each city charter department;
- Reporting of training levels of city staff regarding LEP services;
- Reporting of progress made by individual departments; and
- Feedback and comments from LEP communities, including LEP community organizations and advocacy groups, on the effectiveness of the city's LEP services.

## Role of the Department LEP Liaison

The role of the **department LEP liaison** will be an on-going position, filled by a department staff person who has a working knowledge of the department's key business lines and LEP clientele.

This position will be responsible for:

- Establishing and chairing the Department LEP Work Team.
- Coordinating the department assessment and planning exercises.
- Coordinating with the NCR Department's Access and Outreach Manager to ensure consistency with city policy during the development and on-going implementation of the Department's LEP Plan.
- Drafting the Department's LEP Implementation Plan with the support of the NCR Department's Access and Outreach Manager.
- Reporting to their Department Head.
- Seeking approval of the Department's LEP Plan from the NCR department's Access and Outreach Manager, and senior department leadership.
- Monitoring progress on the implementation of the Department's LEP Plan.
- Coordinating the annual evaluation and updating of the Department's LEP Plan together with the NCR Department's Access and Outreach Manager.

## Role of the Access and Outreach Manager

The Access and Outreach Manager oversees the development and implementation of the citywide Limited English Proficiency plan and manages the day-to-day operations of the Access and Outreach Division, within the Neighborhood and Community Relations Department. The Access and Outreach Manager is charged with working collaboratively across city departments and with community organizations in order to improve the accessibility of city services to residents who speak little or no English.

Primary Responsibilities:

- Oversee operations of the Access and Outreach Division;
- Supervise Access and Outreach Specialists, support staff and interns;

- Ensure access point to city services for non-English and limited English speaking city residents is provided;
- Ensure that prompt, in-person and telephone interpretation and assistance is provided;
- Develop and maintain relationships with community based organizations and governmental units in order to facilitate communication about and coordination of services and needs;
- Inform city staff, management and elected officials about the issues facing limited and non-English speaking persons and their ability to integrate into the economic and social community of Minneapolis;
- Track volume of requests for services and evaluate the effectiveness of initiatives in meeting the goal of assisting limited and non-English speaking individuals;
- Develop and manage contracts and budgets;
- Lead citywide Limited English Proficiency (LEP) Planning process and work with the City Coordinator's Office to implement, adapt, monitor and update the LEP Plan;
- Work closely with the Limited English Proficiency task force to identify and implement short and long term solutions to LEP clientele of city services;
- Provide assistance to city departments regarding LEP challenges and facilitate relationships with LEP persons and organizations, e.g., in communicating snow emergencies and other city activities to Hmong, Spanish, and Somali speaking communities, coordinating translation of signage and public documents for the city, and acting as information clearing house and contact for departments about immigration activities in the city.

## **Resolving Complaints about LEP Services**

Complaint pathways will address customer concerns regarding poor customer service or the timeliness or quality of interpreter services. The complaints may be made in a number of ways: face to face, by telephone or in writing via the U.S. mail or email. In addition, with the development and implementation of the 311 system there may be opportunities for multilingual voicemail systems to function as comment lines.

Departments will follow their established complaint procedures for LEP persons to make complaints about services received. Departments will document actions taken to resolve each complaint in a timely manner. To ensure continuous improvement in service to LEP persons, the city will seek input from non-English or limited English proficient communities, as well as community-based and advocacy organizations that work and interact with limited English proficient communities.

## **8. Glossary of Terms**

## **Effective Communication**

Effective communication occurs when provider staff has taken the necessary steps to make sure that a person with limited English proficiency is given adequate information to understand the services and benefits available and received the benefits for which he/she is eligible. Effective communication also means that a person with limited English proficiency is able to communicate the relevant circumstances of his/her situation to the provider.

## **Interpreting/Interpretation**

Interpretation is the translation of a spoken message from one language to another, preserving the intent and meaning of the original message.

## **Limited English Proficiency**

A person with limited English proficiency (LEP) cannot speak, read, write or understand the English language at a level that permits him or her to interact effectively with city staff.

Individuals who communicate with American Sign Language (ASL) are covered in this definition, although other Federal laws and regulations such as the Americans with Disabilities Act (ADA) apply and should be consulted separately.)

## **Meaningful Access**

Federal standards require that organizations receiving federal funds provide meaningful access to the services for LEP individuals. A person has meaningful access when he or she:

- Is given adequate information;
- Can understand the services and benefits available;
- Can receive the services for which he or she is eligible; and
- Can communicate the relevant circumstances of his or her situation to the service provider.

## **Notice**

Notice means proactively informing LEP residents of Minneapolis that they are entitled to LEP services.

## **Primary Languages**

Languages spoken by at least 1,000 Minneapolis residents.

## **Resident**

Someone who lives within the city boundaries. This plan applies to anyone who lives, works in or visits the City of Minneapolis. In this document, the term “resident” is not related to immigration status.

## **Timely**

Avoids the effective denial or delay of important benefits or services.

## **Translation**

The written transfer of a message from one language into another language.



## 9. Resources

The chapter includes:

- General resources
- Resources for LEP service
- List of LEP Liaisons

# General resources

## A. How to calculate primary languages

Every year, the primary languages in Minneapolis are calculated using a formula that extrapolates data from the Minneapolis Public Schools and the most recent census. The formula is used to identify which languages are spoken by at least 1,000 Minneapolis residents as their primary language.

The formula,  $\frac{X}{Y} * Z$  is used where Y = the number of Minneapolis public school students, X = the total population of Minneapolis and Z the number of Minneapolis school students who report speaking a specific language other than English at home.

Once the number of LEP residents is computed by language, the language groups can be listed in order of size and the 1,000 resident cutoffs can be applied.

This formula is used because it can be updated annually (the two main variables are recounted at the beginning of each school year) and it is more directly tied to language rather than the other population based data sources that are based on ethnicity or county of origin. It is not, however, an exact measure of the LEP community, because of the recognized undercounting of minority populations in the US Census.

## B. Online general resources

United State Census Information

<http://www.uscensus.gov>

Department of Administration- Demography Center

<http://www.demography.state.mn.gov>

US Citizenship and Immigration Service

<http://www.uscis.gov>

MN Advocates for Human Rights

<http://www.mnadvocates.org>

## C. Online resources for LEP service

<http://www.lep.gov>

An electronic clearinghouse run by the federal government, providing and linking to information, tools, and technical assistance regarding Limited English Proficiency and language services for federal agencies, recipients of federal funds, users of federal programs and federally assisted programs and other stakeholders.

## **D. Learn more about the Spanish, Somali or Hmong cultures:**

### **Spanish**

- [Latino - Hispanic Heritage](#) - A person with Latino heritage means that they are descendants of a family from Mexico, the Caribbean, Central America, and South America. Learn more at [www.42explore2.com/latino.htm](http://www.42explore2.com/latino.htm)
- [Mexican Culture | Traditions, Legends, Art, Music](#): Traditions that are the pride of the **Mexican** people. [www.facts-about-mexico.com/mexican-culture.html](http://www.facts-about-mexico.com/mexican-culture.html)

### **Somali**

- The U.S. Department of State gives good background information about the history of Somalia.  
<http://www.state.gov/r/pa/ei/bgn/2863.htm#people>
- Some young people in high school decided to share what they were finding out about the Somali culture. They decided that the best way to do it was to build a website.  
<http://www.somaliculture.net/index.html>
- A resourceful tip sheet about the Somali culture put together by the Diversity Council.  
[http://www.diversitycouncil.org/toolkit\\_preview/Resources\\_TipSheet\\_SomaliCultre.pdf](http://www.diversitycouncil.org/toolkit_preview/Resources_TipSheet_SomaliCultre.pdf)

### **Hmong**

- Lao Family Community of Minnesota, Inc., has prepared the following summaries about the history and culture of the Hmong people to increase awareness and understanding of the Hmong people.  
<http://www.laofamily.org/page20213242.aspx>
- Hmong Cultural Center has a Hmong 101 PowerPoint presentation, updated with new Hmong demographics from the U.S. Census.  
<http://www.hmongcc.org>

## Limited English Proficiency (LEP) Department Liaisons 2012

Department	LEP Liaison	Tel Ext	Email
311	Dawn Misencik	5925	<a href="mailto:Dawn.Misencik@ci.minneapolis.mn.us">Dawn.Misencik@ci.minneapolis.mn.us</a>
911	Nancy Martin	5913	<a href="mailto:Nancy.Martin@ci.minneapolis.mn.us">Nancy.Martin@ci.minneapolis.mn.us</a>
BIS	Elise Ebhardt	2026	<a href="mailto:Elise.Ebhardt@ci.minneapolis.mn.us">Elise.Ebhardt@ci.minneapolis.mn.us</a>
City Assessor	Denise Lingwall	2389	<a href="mailto:Denise.Lingwall@ci.minneapolis.mn.us">Denise.Lingwall@ci.minneapolis.mn.us</a>
City Assessor	Valerie Thompson	2392	<a href="mailto:Valerie.Thompson@ci.minneapolis.mn.us">Valerie.Thompson@ci.minneapolis.mn.us</a>
City Attorney	Colleen O'Brien	2966	<a href="mailto:Colleen.O'Brien@ci.minneapolis.mn.us">Colleen.O'Brien@ci.minneapolis.mn.us</a>
City Clerk/Mayor/Council	Jackie Hanson	2046	<a href="mailto:Jackie.Hanson@ci.minneapolis.mn.us">Jackie.Hanson@ci.minneapolis.mn.us</a>
Civil Rights	Lee Zutz	2091	<a href="mailto:Lee.Zutz@ci.minneapolis.mn.us">Lee.Zutz@ci.minneapolis.mn.us</a>
Communications	Elizabeth Haugen	2009	<a href="mailto:Elizabeth.Haugen@ci.minneapolis.mn.us">Elizabeth.Haugen@ci.minneapolis.mn.us</a>
CPED	Krista Bergert	5015	<a href="mailto:Krista.Bergert@ci.minneapolis.mn.us">Krista.Bergert@ci.minneapolis.mn.us</a>
Convention Center	Linda Denson	335- 6372	<a href="mailto:Linda.Denson@ci.minneapolis.mn.us">Linda.Denson@ci.minneapolis.mn.us</a>
Finance	Tony DiPietrantonio	2472	<a href="mailto:Tony.DiPietrantonio@ci.minneapolis.mn.us">Tony.DiPietrantonio@ci.minneapolis.mn.us</a>
Fire Department	Casidy Anderson	919- 7790	<a href="mailto:Casidy.Anderson@ci.minneapolis.mn.us">Casidy.Anderson@ci.minneapolis.mn.us</a>
Health and Family Support	Seble Bekele	3584	<a href="mailto:Seble.Bekele@ci.minneapolis.mn.us">Seble.Bekele@ci.minneapolis.mn.us</a>
Human Resource	Charles Bernardy	3103	<a href="mailto:Charles.Bernardy@ci.minneapolis.mn.us">Charles.Bernardy@ci.minneapolis.mn.us</a>
Intergovernmental Relations	Matt Bower	2188	<a href="mailto:Matthew.Bower@ci.minneapolis.mn.us">Matthew.Bower@ci.minneapolis.mn.us</a>
Police Department	Mary Lou Fiala	3420	<a href="mailto:MaryLou.Fiala@ci.minneapolis.mn.us">MaryLou.Fiala@ci.minneapolis.mn.us</a>
Public Works	Millicent Flowers	3071	<a href="mailto:Millicent.Flowers@ci.minneapolis.mn.us">Millicent.Flowers@ci.minneapolis.mn.us</a>
Regulatory Services	Mohamed Ismail	3904	<a href="mailto:Mohamed.Ismail@ci.minneapolis.mn.us">Mohamed.Ismail@ci.minneapolis.mn.us</a>

